IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO EASTERN DIVISION

RU-EL SAILOR,

Plaintiff, Case No. 1:20-cv-00660

-vs- Judge David A. Ruiz

CITY OF CLEVELAND, et al.,

Defendants. PLAINTIFF'S MOTION TO STAY

Plaintiff, through counsel, respectfully requests that the Court enter an order staying all briefing and deadlines associated with Defendants' Motion for Dismissal (Dkt. 88).

On July 17, 2024, counsel for Plaintiff filed their Motion to Withdraw as counsel. (Dkt. 82). In the Motion, counsel requested that the Court stay the case for six months to permit Plaintiff to obtain new counsel. On July 24, 2024, with the Motion to Withdraw still pending, Plaintiff filed an unopposed Motion for Extension of all case deadlines. (Dkt. 87). On July 25, 2024, Defendants filed their Motion for Dismissal. (Dkt. 88).

Pursuant to Fed. R. Civ. P. 6 and L.R. 7.1, Plaintiff's response to Defendants' Motion is currently due Monday, August 26, 2024. As counsel's Motion to Withdraw remains pending, Plaintiff respectfully requests that the Court stay all briefing and response deadlines associated with Defendants' Motion for Dismissal until: (a) after the resolution of the Motion to Withdraw (Dkt. 82); (b) after Plaintiff is able to obtain

new counsel; and (c) after new counsel are afforded reasonable time to respond to Defendants' Motion.

Respectfully submitted,

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on July 26, 2024, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all registered parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

<u>/s/Jacqueline Greene</u> One of the Attorneys for Plaintiff